

# Exhibit 20

**In the Matter of Gregory Royal**

**Case Number: 14-56-22**

**Agency: United States Patent and Trademark Office**

**STATEMENT OF CHINYERE MPAMUGO**  
**WITNESS**

On August 19, 2014, I was interviewed by the designated EEO Investigator, Lisa A. Kleine. Ms. Kleine explained to me that she was investigating allegations made by the Complainant that he was discriminated against in the form of a hostile work environment on the bases of sex (male) and race (African American/Black) since:

1. *On or about December 13, 2013, Complainant alleges his complaints of hostile work environment were not taken seriously because he is a "six foot, medium built black man" and the alleged harasser is a white woman;*
2. *On or about November 07, 2013, he was physically assaulted by a white female co-worker;*
3. *On or about December 13, 2013 and continuing Complainant alleges that his harasser as been allowed to continue to violate USPTO policies on workplace safety and conduct by bringing several knives to the workplace and threatening Complainant.*
4. *On or about July 10, 2014, he alleges he was physically assaulted in the workplace by another Agency employee whereby other examiners see him as a "punching bag" to be slapped, and nothing will happen to them for doing so.*
5. *On or about August 14, 2014, during the Patent Examiner Efficiency Exam (Exam), Complainant he was further subjected to a hostile work environment because the Agency failed to take sufficient action<sup>2</sup> to prevent him from being subject to a hostile work environment when:*
  - a. *the Alleged Harasser was to be allowed to take the Exam in the same room and the same time as Complainant was, despite the fact that she was moved to a different "Lab" than he was on or about December 13, 2013;*
  - b. *the Alleged Harasser failed to follow the Exam Proctor's instructions to remain silent by approaching the cubicle in front of the one where Complainant was seated and began a "loud conversation" with another employee, and she "did so solely to annoy [sic] Complainant's focus" and "under the cloak of being social," the Alleged Harasser sought to disturb Complainant's focus for the Exam; and*
  - c. *When the Exam Proctor spelled the name of an employee Complainant believes to be "Islamic" due to his name being "Mohammed," another employee was allowed to mock, not for the first time, those of the Islamic faith.*

I was advised by Ms. Kleine of my rights as a witness/party in an EEO case, and was informed that my statement would and may be reviewed by the agency, the Office of Equal Employment Opportunity and Diversity and other interested parties, in the context of this claim. I have also been advised that there is no assurance of confidentiality as to the testimony given herein. I was also advised that I had the right to have a representative assist me in these proceedings, but chose not to.

The following represents a true and accurate summary/statement of the information that I provided to Ms. Kleine.

1. Please state your full name and identify your sex and race.

Chinyere Mpamugo. Race: African American. Sex: Female.

2. Please indicate your current position, your grade and step, the name of your current supervisor, the length of time you have been in your current position, your Art Unit and Technology Center.

I am a Patent Examiner. I am a GS-11 Step 5. My supervisor is Rutao Wu and I am in Art Unit 3621. Business Methods, Technology Center 3600. I have been in this position since September 9, 2013.

3. Please describe your duties and responsibilities in your current position.

I review patent statutes and use those to draft office actions. Attorneys send in application for inventions, and I review the application and decide whether the inventions are patentable or not using the patent statutes.

4. Do you know the Complainant in this matter Gregory Royal, and if so, explain how you know him.

I do know him, not well. I know him from starting at the Patent Training Academy. There are not many other African Americans in our Academy class. I was in Lab 7.

5. Do you know the Complainant's race? How do you know his race?

I am guessing he is African American. I know this from talking with him; he said he is from the south, and from seeing him.

6. Do you know Complainant's sex, and if so, how do you know his sex?

Yes, he is male. I know this from observation and by his first name.

7. Complainant Gregory Royal has complained about an incident that occurred in a lecture hall in the Madison West building on July 10, 2014. Did you attend the lecture given by Mr. Lyle Alexander on that day?

Yes. I sat right behind Mr. Royal that day.

8. Do you recall witnesses Mr. Royal being struck on the back of the head or neck by another examiner?

Yes.

9. Describe what you saw?

A young male came in, who looked to be Asian, and contact was made. I can't say that it was forceful. It looked like a friendly tap. I laughed. Mr. Royal reacted in a way that showed he did not like it at all. I think the guy said "Hey what's up?" and walked to the back of the lecture hall.

10. How did Mr. Royal react?

He was extremely angry. That is when I stopped laughing. I was not sure what the relationship was between Mr. Royal and the other man. Mr. Royal said he had talked to this guy before about touching him. He was really angry.

I was trying to calm him down and said something like, "Maybe he did not mean it that way." Mr. Royal said, "I've been talked to him about this before." Mr. Royal said he was from the South and there are some things that are disrespectful. I did not grow up in the South, so I left it alone.

11. Did anyone else say anything?

Tasnima Matin, she was sitting next to me. Most people were afraid to say anything because Mr. Royal is a pretty big guy.

12. Did Mr. Royal's reaction appear out of proportion to the incident?

For me, yes. But I don't know how he was raised or brought up and I do not want to dismiss his feelings. I'm not Mr. Royal.

13. Did the other person involved say anything?

He was sitting in the back laughing. I saw Mr. Royal talk to him after class, maybe having a man to man talk.

14. Did you ever observe Mr. Royal being harassed or bullied by any of the other examiners?

No. He mentioned to me that he was attacked but I do not know the details of that. He said some white woman did something to him and I walked away when he started talking about it. I did not want to get involved.



15. Do you have the perception that he can be struck with impunity and there will be no repercussions by management at USPTO?

It is hard to say. His personality, he can be a little confrontational, in your face. It's like he is competing with you – he is kind of arrogant. I don't know him well enough to answer that question.

16. But have you ever seen anything?

No.

17. If you were to have problems with a co-worker, how have you been instructed to handle any such problems?

I would go to my supervisor and talk to him. I have a good relationship with him and maybe the supervisor would say talk to EEO office, or the supervisor could talk with the other person's supervisor. In my prior employment, you would have a meeting with the managers and the co-workers involved before it got bigger. Some issues are simply miscommunication and can be resolved with just a short conference.

18. Did you talk with any about this incident?

Yes, I did talk with the friend who sat next me, Tasnima Matin. But then we just forgot about it. We were kind of surprised. We were surprised at the extent of his reaction for someone touching him on the back of the neck.

19. Did you witness any other incidents described in the email sent to you by the investigator?

No I did not.

20. Had you hear anything about security being call in another lab back in December, 2013?

No I did not.

21. Was it common knowledge that there was a problem between Mr. Royal and a co-worker?

No.

22. Other than any conversations you have had with the EEO investigator assigned to this matter, did you discuss the contents of this testimony and/or receive any assistance from anyone in the preparation of your testimony? If yes, who?

I did not receive assistance or speak about this testimony with anyone. However, I did speak of the incident around the time it occurred with Tasnima Matin.

23. Is there anything you have not been asked about the July 10 incident that you think is important?

I don't think so.

24. Did anyone from Human Resources (HR) or the Office of General Counsel (Legal) review your Affidavit or assist you with your responses before you signed and submitted your Affidavit to the Investigator? If the answer is yes, please provide the name, position and title of that individual(s) along with the Agency office to which s/he is assigned.

ANSWER:

No

OATH

I, Chinyere Mpamugo, have read the above statement/affidavit and being duly informed, and understanding the penalties of perjury; duly swear under oath that the statements made in this Affidavit are true and correct, and complete, to the best of my knowledge.

Dated: August 19, 2014 Chinyere J.O. Mpamugo  
Chinyere Mpamugo, Witness/Affiant

Subscribed and sworn to me this 19th day of August, 2014.



Lisa A. Kleine, EEO investigator, or Notary Public